

EXHIBIT B

Hynes, Eleanor M.

From: Joshua P. Graham [JGraham@merchantgould.com]
Sent: Monday, March 01, 2010 11:47 AM
To: Hynes, Eleanor M.
Cc: Daniel McDonald; Carr, Dabney J.
Subject: RE: ePlus v. Lawson - Supplements to Interrogatory Responses
Follow Up Flag: Follow up
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Eleanor,

As stated in my previous email, Lawson has attempted to work with ePlus regarding its responses to Interrogatory Nos. 19 and 20 for the better part of a month. ePlus only four days ago raised issues with Lawson's non-infringement contentions. Lawson is willing and available to meet with you on Wednesday, Thursday, or Friday of this week to discuss Lawson's non-infringement contentions. However, under the circumstances, and consistent with ePlus's arguments during discovery, it is inappropriate to condition ePlus's supplementation of its response to Interrogatory Nos. 19 and 20 upon Lawson's supplementation of its non-infringement responses. If ePlus unconditionally agrees to supplement its responses to Interrogatory Nos. 19 and 20 by March 11, and does so, Lawson will withdraw its motion to compel.

If you wish to discuss Lawson's non-infringement contentions, please let us know your availability.

-Josh

Joshua P. Graham

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From: Hynes, Eleanor M. [mailto:EHynes@goodwinprocter.com]
Sent: Monday, March 01, 2010 8:25 AM
To: Joshua P. Graham
Cc: Daniel McDonald
Subject: RE: ePlus v. Lawson - Supplements to Interrogatory Responses

Josh,

I am surprised and disappointed by your threat since ePlus has already agreed to supplement its responses. The same discovery rules apply to ePlus as apply to Lawson. If for whatever reason Lawson does not believe it must provide meaningful responses to ePlus's contention interrogatories until after March 11th, the same should apply

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to ePlus. Conversely, if Lawson insists on responses from ePlus by that date, then the same should apply to Lawson. If March 11th does not work for you, ePlus remains open to discussing a proposed a date certain for the parties to exchange supplemental responses.

Eleanor

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From: Joshua P. Graham [mailto:JGraham@merchantgould.com]
Sent: Friday, February 26, 2010 3:32 PM
To: Hynes, Eleanor M.
Cc: Daniel McDonald
Subject: RE: ePlus v. Lawson - Supplements to Interrogatory Responses

Dear Eleanor,

Lawson notified ePlus that the responses to Interrogatory Nos. 19 and 20 are deficient on February 1. By contrast, ePlus only yesterday raised issues with Lawson's non-infringement contentions. Lawson has had no time to consider ePlus's position. Under the circumstances, it is inappropriate to require Lawson to supplement its non-infringement contention as a condition to ePlus supplementing its responses to Interrogatory Nos. 19 and 20.

Lawson is willing to discuss its non-infringement contentions with ePlus sometime next week. However, the issues with ePlus's responses to Interrogatory Nos. 19 and 20 have been pending for nearly a month and must be dealt with first. Unless ePlus unconditionally agrees by 5pm EST today to supplement its responses to Interrogatory Nos. 19 and 20 by March 11, 2010, Lawson will file with the court today a motion to compel supplemental responses from ePlus.

Josh

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From: Hynes, Eleanor M. [mailto:EHynes@goodwinprocter.com]
Sent: Friday, February 26, 2010 11:58 AM

3/12/2010

To: Joshua P. Graham

Subject: ePlus v. Lawson - Supplements to Interrogatory Responses

Dear Josh:

I write to follow-up to your conversation earlier today with Michael Strapp and Jimmy Clements regarding supplementing interrogatory responses. ePlus will agree to supplement its response to Lawson's invalidity contentions (with respect to the alleged prior-art references included in the claim charts of Lawson's Statement of Invalidity Defenses) on March 11, 2010, provided that Lawson agrees to supplement to its non-infringement contentions on March 11th to address and cure the deficiencies set forth in, e.g., Michael Strapp's letter of February 25th. Please let me know if Lawson will agree to this proposed exchange on March 11th.

Eleanor

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